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June 26, 2023

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Jones, et al. v. The City of New York*, No. 17 Civ. 7577

Dear Judge Koeltl:

This firm represents Plaintiffs Baron Spencer and Lloyd Jones in this action.

Pursuant to Section VI(A)(2) of Your Honor's Individual Rules, we seek permission to file on the public docket a redacted copy of **Exhibit 8 to the Declaration of Tiffaney Janowicz** and **Exhibit 3 to the Declaration of Debra L. Greenberger**, and to file under seal an unredacted version of these exhibits as they pertain to Frederick Williams.

As the Court is aware, Mr. Williams has filed an objection to the proposed class action settlement agreement between the parties in this action. As class counsel, we wish to file Mr. Williams's objection letter on the docket so that it is part of the record in this case. However, there is sensitive and personal information contained in Mr. Williams's correspondence, including details regarding a physical assault and other health information. Mr. Williams may desire that certain information in his correspondence remain sealed from public view. To that end, we have chosen to file unredacted versions of his correspondence under seal and redacted versions of his correspondence on the public docket. Should the Court order that unredacted versions of his correspondence be filed on the public docket, Class Counsel will do so with the exception of his date of birth, social security number, and other personally-identifying information.

We thank the Court for its consideration of this letter.

APPLICATION GRANTED
SO ORDERED

Respectfully,
/s/
Debra L. Greenberger


John G. Koeltl, U.S.D.J.

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cc: All counsel of record (via ECF)
Frederick Williams & Taia Harris (via First-Class Mail)